

State of Missouri  
Office of Secretary of State

Case No. AP-10-37

IN THE MATTER OF:

BURANESS MANAGEMENT, LLC;  
ISAAC WILLIAMS; and LATONJIA RODDY,

Respondents.

Serve Buraness Management, LLC at:  
4579 Laclede Avenue, Suite 266  
St. Louis, Missouri 63108

Serve Isaac Williams at:  
700 Lenox Avenue, #3J  
New York, New York 10039

Serve Latonjia Roddy at:  
2553 Westfall Lane  
St. Louis, Missouri 63106

**ORDER TO CEASE AND DESIST AND ORDER TO SHOW  
CAUSE WHY CIVIL PENALTIES AND COSTS SHOULD NOT  
BE IMPOSED**

On November 9, 2010, the Enforcement Section of the Securities Division of the Office of Secretary of State (the "Enforcement Section"), through the Securities Division's Chief Enforcement Counsel, Nathan Soendker, submitted a Petition for Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should Not Be Imposed. After reviewing the petition, the Commissioner issues the following findings of fact, conclusions of law and order:

**FINDINGS OF FACT**

1. Buraness Management, L.L.C. ("Buraness"), is a Missouri limited liability company organized on February 4, 2005. Buraness was organized by Isaac Williams ("Williams") and Latonia Roddy ("Roddy") for the purpose of engaging in the business of property management and has a last known address of 4579 Laclede Avenue, Suite 266, St. Louis, Missouri 63108.
2. Williams is an individual with a last known address of 700 Lenox Avenue, #3J, New York, New York 10039.
3. A check of the records maintained by the Missouri Commissioner of Securities on November 8, 2010, indicates that Williams has never been registered with the State of Missouri as a broker-dealer agent, investment adviser representative or issuer agent.

4. Roddy is a Missouri licensed insurance producer (#8042169) with a last known address of 2553 Westfall Lane, St. Louis, Missouri 63136. Roddy is a regional manager and registered agent for Buraness.
5. A check of the records maintained by the Missouri Commissioner of Securities on November 8, 2010, indicates that Roddy has never been registered with the State of Missouri as a broker-dealer agent, investment adviser representative or issuer agent.
6. For purposes of this order the term "Respondents" shall refer to Buraness, Williams and Roddy.
7. In 2006, a 30-year-old New York resident ("NYR1") employed with Bank of America became acquainted with Williams, who was a customer at the bank branch where NYR1 worked.
8. In December 2006, NYR1 moved from New York to Orlando, Florida. Around that same time, Williams solicited NYR1 with an investment opportunity that promised a fifteen percent (15%) rate of return within sixty (60) days.
9. On December 14, 2006, an "Investor Agreement" contemplating an investment in the amount of ten thousand dollars (\$10,000.00) was sent by Roddy via facsimile to NYR1. Roddy executed the agreement on behalf of Buraness. The agreement stated the investment funds would be used "towards 4159 Farlin Ave., St. Louis, Missouri 63115" and that funds would be paid back on February 14, 2007, with a fifteen percent (15%) rate of return.
10. On December 14, 2006, NYR1 sent via wire transfer the amount of ten thousand dollars (\$10,000.00) credited to Buraness' Bank of America account ending in 2727 (the "Buraness Bank Account").
11. During the course of its investigation, the Enforcement Section determined that NYR1 made an additional investment with Buraness on December 22, 2006, after being solicited by Williams. NYR1 initiated a wire transfer in the amount of six thousand dollars (\$6,000.00) credited to the Buraness Bank Account. According to NYR1, this investment was to be used for cleanup of real estate properties and that funds would be paid back plus one thousand dollars (\$1,000.00) in interest. There was no written agreement documenting the investment.
12. On January 3, 2007, NYR1 received a wire transfer from the Buraness Bank Account in the amount of seven thousand dollars (\$7,000.00). NYR1 stated that this transfer represented the repayment of the six thousand dollar (\$6,000.00) investment and the one thousand dollars (\$1,000.00) in interest per the December 22, 2006, agreement.
13. On January 5, 2007, Williams solicited NYR1 for an additional investment of eight thousand two hundred dollars (\$8,200.00). Under the terms of the offer, this investment, along with interest in the amount of one thousand dollars (\$1,000.00) was to be paid back within one (1) month.
14. On January 5, 2007, NYR1 initiated a wire transfer in the amount of eight thousand two hundred dollars (\$8,200.00) credited to the Buraness Bank Account. There was no written agreement documenting the investment.

15. NYR1 received only two (2) one thousand dollar (\$1,000.00) payments and one (1) two thousand dollar (\$2,000.00) payment in the form of wire transfers from Buraness in connection with the January 5, 2007, investment. NYR1 has since made several attempts to contact Buraness regarding the remaining unpaid monies with no response.
16. On January 14, 2010, in a telephone interview with an investigator from the Enforcement Section, NYR1 stated that:
  - a. Williams did not disclose any possible risks to the investment;
  - b. Williams did not provide NYR1 with any financial statements or other information concerning Buraness's financial condition;
  - c. Williams did not provide NYR1 with any background information on the managers of Buraness; and
  - d. Williams did not tell NYR1 that the securities being offered were not registered or exempt from registration.
17. Another investor, a 39-year-old New York resident ("NYR2"), had been acquainted with Williams since 1989 and was contacted by Williams in October 2008, because Williams "needed an investor to help flip a property in St. Louis."
18. NYR2 met Williams at a restaurant where they rented a computer and accessed the Internet. Williams showed NYR2 a St. Louis, Missouri, property online and told NYR2 that the investment would generate a two thousand dollar (\$2,000.00) profit in three (3) to four (4) months for an eight thousand dollar (\$8,000.00) investment.
19. When NYR2 expressed a concern about the risk of the investment, Williams informed NYR2 that Williams "had done this many times with his other investors . . . and it was a success."
20. On October 31, 2008, NYR2 initiated a wire transfer in the amount of eight thousand dollars (\$8,000.00) credited to the Buraness Bank Account. NYR2 understood that NYR2 was to receive documents regarding the investment the same week the funds were sent.
21. To date, NYR2 has not received documentation relating to the investment and has not received any return from Buraness.
22. On October 30, 2009, NYR2 contacted Buraness via email to inform Buraness of NYR2's problems with Williams and to ask for a return of NYR2's initial investment within 30 days.
23. On November 3, 2009, NYR2 sent a certified letter to Buraness, including a copy of the October 30, 2009, email, asking for resolution and return of the investment.
24. On December 1, 2009, NYR2 attempted to contact Buraness by leaving two voicemail messages, but, to date, NYR2 has not received a response.
25. On October 25, 2010, an investigator from the Enforcement Section contacted NYR2.

NYR2 stated that, to date, NYR2 has not received the remainder of NYR2's investments or interest due.

26. On April 23, 2009, a check of the website [www.buraness.com](http://www.buraness.com) indicated Buraness Management was acting as a full-service property management company operating with the last known address of 4579 Laclede Avenue, Suite 266, St. Louis, Missouri 63108, with phone number 314-662-1686. On June 16, 2010, a check of the website [www.buraness.com](http://www.buraness.com) indicated the website expired.
27. On June 22, 2009, the Enforcement Section received bank records for the Buraness Bank Account for the period of January 1, 2006, to May 31, 2009. The account was indicated as "Business Economy Checking" with Roddy and Williams as signators.
28. A review of the bank records revealed that there may have been approximately five (5) additional individuals residing in Missouri and New York that invested funds in Buraness.
29. A review of the bank records revealed Williams and Roddy spent Buraness funds on a variety of personal expenses, including but not limited to:
  - a. "Jamaican Treasures," private luxury villa rentals, with an approximate debit of one thousand six hundred dollars (\$1,600.00);
  - b. "Last Minute Getaways," with an approximate debit of one thousand seven hundred fifty dollars (\$1,750.00);
  - c. Monthly car payments to "American Honda Financial" by Roddy, with an approximate debit of four hundred eleven dollars (\$411.00);
  - d. Hotels, such as Renaissance Hotels, Courtyard by Marriott, Townplace Suites, Residence Inns, Omni Hotels, Hotel Lumiere, and Four Seasons Hotel, with an approximate debit of three thousand nine hundred dollars (\$3,900.00);
  - e. Airline ticketing, such as Priceline, United Air, Southwest Air, US Airways, and American Airlines, with an approximate debit of four thousand three hundred dollars (\$4,300.00);
  - f. Car rentals, such as, Budget Rent-A-Car, Enterprise Rent-A-Car, and Avis Rent-A-Car, with an approximate debit of one thousand two hundred dollars (\$1,200.00);
  - g. Restaurants, such as Applebees, IHop, Longhorn, Bubba Gump, Dady Rock Cancun, Ohana Japanese Steakhouse, and The Drunken Fish, with an approximate debit of five thousand three hundred dollars (\$5,300.00);
  - h. Clothing stores, such as Victoria's Secret, Burlington Coat Factory, Sears, Dillards, Banana Republic, The Gap, Bed, Bath and Beyond, Target, JC Penney, Eddie Bauer, New York & Company, Macy's, Finish Line, Kenneth Cole, and Polo-Ralph Lauren, with an approximate debit of five thousand two hundred dollars (\$5,200.00); and
  - i. Miscellaneous transactions, such as, Tiffany & Co., Crystal Nails, New York

City Parking fines, PetSmart Inc, with an approximate debit of one thousand three hundred fifty dollars (\$1,350.00).

30. In addition, Williams and Roddy withdrew cash from the Buraness Bank Account, in some instances totaling over ten thousand dollars (\$10,000.00) per month. To date, the Enforcement Section has not been able to ascertain how the monies were spent.
31. Respondents did not inform NYR1 and NYR2 that investor funds would be used for the personal expenses of Williams and Roddy.
32. On March 16, 2009, the Enforcement Section requested information from Buraness, Williams, and Roddy by certified mail with a response due on April 15, 2009. On March 26, 2009, a signed certified mail receipt was returned to the Enforcement Section confirming delivery.
33. On April 16, 2009, the Enforcement Section received a letter dated April 10, 2009, from Buraness, signed "'Management' for Buraness Management/09." The letter stated that Buraness "is not disputing [NYR2's] claims in regards to [NYR2's] investment" and that NYR2 could expect repayments to begin in May 2009.
34. On June 2, 2009, the Enforcement Section requested additional information from Buraness and Williams by certified mail with a response due on June 16, 2009. On June 8, 2009, a signed certified mail receipt was returned to the Enforcement Section confirming delivery. No response was received.
35. On July 2, 2009, the Enforcement Section requested additional information from Buraness, Williams and Roddy by certified mail with a response due on July 16, 2009. On July 7, 2009, a signed certified mail receipt was returned to the Enforcement Section confirming delivery. No response was received.
36. On December 9, 2009, the Enforcement Section issued a Subpoena Duces Tecum to Buraness, Williams, and Roddy to appear and produce documents on December 21, 2009. On December 17, 2009, a signed certified mail receipt was returned to the Enforcement Section confirming delivery. Respondents failed to appear or produce documents on December 21, 2009.
37. On April 14, 2010, the Enforcement Section issued a Subpoena Duces Tecum to Buraness, Williams, and Roddy to appear and produce documents on May 17, 2010. On April 20, 2010, a signed certified mail receipt was returned to the Enforcement Section confirming delivery. Respondents failed to appear or produce documents on May 17, 2010.
38. On June 28, 2010, the Enforcement Section issued a Subpoena Duces Tecum to Buraness, Williams, and Roddy to appear and produce documents on July 6, 2010. On July 1, 2010, a signed certified mail receipt was returned to the Enforcement Section confirming delivery. Respondents failed to appear or produce documents on July 6, 2010.

## **II. STATUTORY PROVISIONS**

39. Section 409.6-601(a), RSMo. (Cum. Supp. 2009), provides that the Missouri Securities Act of 2003 "shall be administered by the commissioner of securities . . . ."

40. Section 409.1-102(1), RSMo. (Cum. Supp. 2009), defines "Agent" as "an individual, other than a broker-dealer, who represents a broker-dealer in effecting or attempting to effect purchases or sales of securities or represents an issuer in effecting or attempting to effect purchases or sales of the issuer's securities. But a partner, officer, or director of a broker-dealer or issuer, or an individual having a similar status or performing similar functions is an agent only if the individual otherwise comes within the term. The term does not include an individual excluded by rule adopted or order issued under this act."
41. Section 409.1-102(26), RSMo. (Cum. Supp. 2009), defines "Sale" to include: "every contract of sale, contract to sell, or disposition of, a security or interest in a security for value." That same section defines "offer to sell" as "every attempt or offer to dispose of, or solicitation of an offer to purchase, a security or interest in a security for value."
42. Section 409.1-102(28), RSMo. (Cum. Supp. 2009), defines "security" as "a note; stock; treasury stock; security future; bond; debenture; evidence of indebtedness; certificate of interest of participation in a profit-sharing agreement; collateral trust certificate; preorganization certificate or subscription; transferable share; investment contract; voting trust certificate; certificate of deposit for a security; fractional undivided interest in oil, gas, or other mineral rights; put, call, straddle, option, or privilege on a security, certificate of deposit, or group or index of securities, including an interest therein or based on the value thereof; put, call, straddle, option, or privilege entered into on a national securities exchange relating to foreign currency; or in general, an interest or instrument commonly known as a "security"; or a certificate of interest or participation in, temporary or interim certificate for, receipt for, guarantee of, or warrant or right to subscribe to or purchase, any of the foregoing."
43. Section 409.3-301, RSMo. (Cum. Supp. 2009) states:
- It is unlawful for a person to offer or sell a security in this state unless:
- (1) The security is a federal covered security;
  - (2) The security, transaction, or offer is exempted from registration under Sections 409.2-201 to 409.2-203; or
  - (3) The security is registered under this act.
44. Section 409.4-402(a), RSMo. (Cum. Supp. 2009), states:
- It is unlawful for an individual to transact business in this state as an agent unless the individual is registered under this act as an agent or is exempt from registration as an agent under subsection (b).
45. Section 409.5-501, RSMo. (Cum. Supp. 2009), states:
- It is unlawful for a person, in connection with the offer, sale, or purchase of a security, directly or indirectly:

- (1) employ a device, scheme, or artifice to defraud;
- (2) To make an untrue statement of a material fact or to omit state a material fact  
     necessary in order to make the statement made, in the light of the  
     circumstances  
     under which it is made, not misleading; or
- (3) To engage in an act, practice, or course of business that operates or  
     would  
     operate as a fraud or deceit upon another person.

46. Section 409.6-604, RSMo. (Cum. Supp. 2009), states:

(a) If the commissioner determines that a person has engaged, is engaging, or is about to engage in an act, practice, or course of business constituting a violation of this act or a rule adopted or order issued under this act or that a person has materially aided . . . an act, practice or course of business constituting a violation of this act . . . the commissioner may:

(1) Issue an order directing the person to cease and desist from engaging in the act, practice, or course of business or to take other action necessary or appropriate to comply with this act.

. . .

(b) An order under subsection (a) is effective on the date of issuance. Upon issuance of the order, the commissioner shall promptly serve each person subject to the order with a copy of the order and a notice that the order has been entered. The order must include a statement whether the commissioner will seek a civil penalty or costs of the investigation, a statement of the reasons for the order, and notice that, within fifteen days after receipt of a request in a record from the person, the matter will be scheduled for a hearing. If a person subject to the order does not request a hearing and none is ordered by the commissioner within thirty days after the date of service of the order, the order becomes final as to that person by operation of law. If a hearing is requested or ordered, the commissioner, after notice of and opportunity for hearing to each person subject to the order, may modify or vacate the order or extend it until final determination.

(c) If a hearing is requested or ordered pursuant to subsection (b), a hearing before the commissioner must be provided. A final order may not be issued unless the commissioner makes findings of fact and conclusions of law in a record in accordance with the provisions of chapter 536, RSMo, and procedural rules promulgated by the commissioner. The final order may make final, vacate, or modify the order issued under subsection (a).

(d) In a final order under subsection (c), the commissioner may:

(1) Impose a civil penalty up to one thousand dollars for a single violation or up to ten thousand dollars for more than one violation;

. . .

(e) In a final order, the commissioner may charge the actual cost of an investigation or proceeding for a violation of this act or a rule adopted or order issued under this act. These funds may be paid into the investor education and protection fund.

. . .

### **III. CONCLUSIONS OF LAW**

#### **Multiple Violations of Offering and Selling Unregistered, Non-Exempt Securities**

47. Paragraphs 1 through 46 are incorporated by reference as though fully set forth herein.
48. Respondents offered and sold securities as those terms are defined in Sections 409.1-102(26) and (28), RSMo. (Cum. Supp. 2009).
49. At all times relevant, records maintained by the Commissioner of Securities contained no registration, granted exemption, or notice filing indicating status as a "federal covered security" for the investments offered and sold by Respondents.
50. Respondents violated Section 409.3-301, RSMo. (Cum. Supp. 2009), when they offered and sold securities in Missouri without these securities being (1) a federal covered security, (2) exempt from registration under Sections 409.2-201 or 409.2-202, RSMo. (Cum. Supp. 2009), or (3) registered under the Missouri Securities Act of 2003.
51. Respondents' actions in offering or selling securities that were not registered, exempt or a federal covered security constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner's authority under Section 409.6-604, RSMo. (Cum. Supp. 2009).

#### **Multiple Violations of Transacting Business as an Unregistered Agent**

52. Paragraphs 1 through 46 are incorporated by reference as though fully set forth herein.
53. At all times relevant, records maintained by the Missouri Commissioner of Securities contained no registration or granted exemption for Respondent Williams or Respondent Roddy to transact business as an agent in the State of Missouri.
54. Respondent Williams and Respondent Roddy violated Section 409.4-402(a), RSMo. (Cum. Supp. 2009), when they transacted business in Missouri as an agent, through the offer or sale of securities to investors, without being registered or exempt from registration as an agent.
55. Respondent Williams and Respondent Roddy's actions in transacting business as unregistered agents constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner's authority under Section 409.6-604, RSMo. (Cum. Supp. 2009).

#### **Multiple Violations of Employing an Unregistered Agent**

56. Paragraphs 1 through 46 are incorporated by reference as though fully set forth herein.
57. Respondent Buraness employed Respondent Williams and Respondent Roddy who transacted business in Missouri by offering and selling securities on behalf Respondent Buraness without the benefit of registration.



58. Respondent Buraness violated Section 409.4-402(d) RSMo. (Cum. Supp. 2009), when it employed unregistered agents who transacted business in the State of Missouri.
59. Respondent Buraness' actions in employing unregistered agents who transacted business in Missouri constitute an illegal act, practice, or course of business and thus such actions are subject to the Commissioner's authority under Section 409.6-604, RSMo. (Cum. Supp. 2009).

**Multiple Violations of Omitting to State Material Facts in Connection with the Offer or Sale of a Security**

60. Paragraphs 1 through 46 are incorporated by reference as though fully set forth herein.
61. In connection with the offer, sale or purchase of a security, Respondents omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, the following:
  - a. the financial condition of Buraness;
  - b. that the securities offered or sold were not registered;
  - c. that Williams and Roddy were not registered to offer or sell securities in or from the State of Missouri;
  - d. how the proceeds of the investment would be utilized;
  - e. that investors' money would be used for Williams' and Roddy's personal expenses;
  - f. risks associated with the investments; and/or
  - g. background information for key personnel of Buraness, including but not limited to, their:
    - i. principal occupations for the previous five years;
    - ii. education and/or experience in real estate management; or
    - iii. past performance in managing investor funds.
62. Respondents violated Section 409.5-501(2), RSMo. (Cum. Supp. 2009), when, in connection with the offer, sale or purchase of a security, they omitted to state material facts necessary in order to make statements made, in light of the circumstances under which they were made, not misleading.
63. Respondents' actions in omitting to state material facts constitute illegal acts, practices, or courses of business and thus such actions are subject to the commissioner's authority under Section 409.6-604, RSMo. (Cum. Supp. 2009).
64. This order is in the public interest and is consistent with the purposes of the Missouri

Securities Act of 2003. See Section 409.6-605(b), RSMo. (Cum. Supp. 2009).

#### **IV. ORDER**

**NOW, THEREFORE,** it is hereby ordered that Respondents, their agents, employees and servants, and all other persons participating in or about to participate in the above-described violations with knowledge of this order be prohibited from:

- A. violating or materially aiding in any violation of Section 409.3-301, RSMo. (Cum. Supp. 2009) by offering or selling any securities as defined by Section 409.1-102(28), RSMo. (Cum. Supp. 2009), in the State of Missouri unless those securities are registered with the Securities Division of the Office of the Secretary of State in accordance with the provisions of Section 409.3-301;
- B. violating or materially aiding in any violation of Section 409.4-402(a), RSMo. (Cum. Supp. 2009), by transacting business as an unregistered agent;
- C. violating or materially aiding in any violation of Section 409.4-402(d), RSMo. (Cum. Supp. 2009), by employing an unregistered agent; and
- D. violating or materially aiding in any violation of Section 409.5-501, RSMo. (Cum. Supp. 2009), by, in connection with the offer or sale of securities, omitting to state a material fact necessary in order to make the statement made, in light of the circumstances under which it is made, not misleading.

**IT IS FURTHER ORDERED** that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against each Respondent for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009), in a final order, unless Respondents request a hearing and show cause why the penalty should not be imposed.

**IT IS FURTHER ORDERED** that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of separate civil penalties of up to ten thousand dollars (\$10,000) each against Respondent Williams and Respondent Roddy for multiple violations of Section 409.4-402(a), RSMo. (Cum. Supp. 2009), in a final order, unless Respondent Williams and Respondent Roddy request a hearing and show cause why the penalty should not be imposed.

**IT IS FURTHER ORDERED** that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of civil penalties of up to ten thousand dollars (\$10,000) against Respondent Buraness for multiple violations of Section 409.4-402(d), RSMo. (Cum. Supp. 2009), in a final order, unless Respondent Buraness requests a hearing and shows cause why the penalty should not be imposed.

**IT IS FURTHER ORDERED** that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of separate civil penalties of up to ten thousand dollars (\$10,000) against each Respondent for multiple violations of Section 409.5-501(2), RSMo. (Cum. Supp. 2009), in a final order, unless Respondents request a hearing and show cause why the

penalty should not be imposed.

**IT IS FURTHER ORDERED** that, as the Enforcement Section has petitioned for an award for the costs of the investigation against Respondents in this proceeding, the commissioner will issue a final order, pursuant to Section 409.6-604(e), RSMo. (Cum. Supp. 2009), awarding an amount to be determined after review of evidence submitted by the Enforcement Section, unless Respondents request a hearing and show cause why such award should not be made.

**SO ORDERED:**

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY,  
MISSOURI THIS 15th DAY OF NOVEMBER, 2010.

ROBIN CARNAHAN  
SECRETARY OF STATE

(Signed/Sealed)  
MATTHEW D. KITZI  
COMMISSIONER OF SECURITIES



State of Missouri  
Office of Secretary of State

Case No. AP-10-37

IN THE MATTER OF:

BURANESS MANAGEMENT, LLC;  
ISAAC WILLIAMS; and LATONJIA RODDY,

Respondents.

Serve Buraness Management, LLC at:  
4579 Laclede Avenue, Suite 266  
St. Louis, Missouri 63108

Serve Isaac Williams at:  
700 Lenox Avenue, #3J  
New York, New York 10039

Serve Latonjia Roddy at:

2553 Westfall Lane  
St. Louis, Missouri 63106

## NOTICE

### **TO: Respondents and any unnamed representatives aggrieved by this Order:**

You may request a hearing in this matter within thirty (30) days of the receipt of this Order pursuant to Section 409.6-604(b), RSMo. (Cum. Supp. 2009), and 15 CSR 30-55.020.

Within fifteen (15) days after receipt of a request in a record from a person or persons subject to this order, the Commissioner will schedule this matter for a hearing.

A request for a hearing must be mailed or delivered, in writing, to:

**Matthew Kitzi, Commissioner of Securities**  
**Office of the Secretary of State, Missouri**  
**600 West Main Street, Room 229**  
**Jefferson City, Missouri, 65102.**

## CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November, 2010, a copy of the foregoing Order in the above styled case was mailed by Certified U.S. mail to:

Buraness Management, LLC  
4579 Laclede Avenue, Suite 266  
St. Louis, Missouri 63108

Isaac Williams  
700 Lenox Avenue, #3J  
New York, New York 10039

Latonjia Roddy  
5706 Roosevelt Place  
St. Louis, Missouri 63112

John Hale  
Specialist